

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. )  
 ) Criminal No. 04-10336-NMG  
 JULIO SANTIAGO et al. )  
 Defendants )

**GOVERNMENT'S RESPONSE TO THE MOTION OF DEFENDANT JOSE TORRADO  
TO MODIFY CONDITIONS OF RELEASE**

The United States Attorney, by and through the undersigned attorneys, now responds to the renewed motion of Defendant Jose Torrado ("Torrado"), dated September 22, 2005, to modify the terms and conditions of his release to eliminate the condition that he wear an electronic monitoring device or, in the alternative, to extend the time in which he can be off the bracelet until 9:00 p.m.

Based upon the grounds for his motion and undersigned counsel's discussion with Pretrial Services ("PTS") Officer Christopher Wylie, Torrado's supervising PTS Officer, the government opposes the defendant's motion proposing the elimination of electronic monitoring of the defendant. Instead, the government does not oppose the extension of time in which Torrado can be off the bracelet until 9:00 p.m., provided that the previously imposed conditions of his release remain in effect.

As ground therefor, the government notes, the parties recently have been involved in plea discussions that have contemplated a period of confinement in prison for the defendant. Although

Torrado has been compliant with the conditions of release imposed by this Court, it is the government's position that this alone does not justify removal of electronic monitoring of the defendant altogether - particularly at this stage in the court proceedings. However, given the defendant's child-care predicament, the government does not oppose modification of the time period within which the defendant must submit to electronic monitoring.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

BY:

/s William F. Bloomer  
WILLIAM F. BLOOMER  
Assistant U.S. Attorney

Dated: September 28, 2005

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served upon Lenore Glaser, Esq., 25 Kingston Street, 6<sup>th</sup> Floor, Boston, MA 02111 a copy of the foregoing document by electronic filing and by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery.

This 28<sup>th</sup> day of September, 2005.

/s William F. Bloomer  
WILLIAM F. BLOOMER  
ASSISTANT UNITED STATES ATTORNEY

